

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re: JEFFREY DONALD NIKOLEYCZIK , aka	:	Chapter 13
Jeffrey D. Nikoleyczik, aka	:	Case No. 16-17350-pmm
Jeffrey Nikoleyczik, and	:	
LORI ANN NIKOLEYCZIK , aka	:	
Lori A. Nikoleyczik, aka Lori Nikoleyczik, aka	:	
Lori A. Georges, aka Lori Georges, aka	:	
Loriann Georges, aka Lori Ann Trovato, aka	:	
Lori A. Trovato, aka Lori Trovato, aka Lori A.	:	
Triano, aka Lori A. Trovato, aka Lori Triano,	:	
Debtors	:	

RESPONSE TO TRUSTEE'S MOTION TO DISMISS

AND NOW COMES Debtor(s) **JEFFREY DONALD NIKOLEYCZIK** and **LORI ANN NIKOLEYCZIK**, by and through their attorneys, FISHER CHRISTMAN, and in Response to the Trustee's Motion to Dismiss avers:

1. Admitted.
2. Admitted.
3. Denied. Debtors have paid \$18,472 to date. COVID-19 exacerbated Debtors' financial condition. Debtors solicited an Amended Chapter 13 Plan to extend their Plan payment period pursuant to 11 U.S.C. § 1329(d), and were provided with a proposed Fifth Amended Chapter 13 Plan to review and, if appropriate execute, prior to the filing of this Response.

WHEREFORE, Debtor(s) **JEFFREY DONALD NIKOLEYCZIK** and **LORI ANN NIKOLEYCZIK** respectfully prays this Honorable Court for an Order than the Trustee's Motion to Dismiss be Denied, and for such other and further relief as the Honorable Court deems just and appropriate.

FISHER CHRISTMAN

By: /s/ J. Zac Christman
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